

UNITED STATES DISTRICT COURT
for the SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

- against -

98 Cr. 1023 (LAK)

:

Hage, et al., includ.

NOTICE OF MOTION

AHMED KHALFAN GHAILANI

:

Defendant.

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AND NOW comes the defendant AHMED KHALFAN GHAILANI, by his attorneys, Peter Enrique Quijano, Esq., Gregory Cooper, Esq., and Michael K. Bachrach, Esq., who will move this Court before the Honorable Lewis A. Kaplan, United States District Judge for the Southern District of New York, in the United States Courthouse, 500 Pearl Street, New York, New York, at a date and time convenient to the Court, for an Order compelling the preservation of Central Intelligence Agency Detention Facilities ("Black Sites") in which the defendant AHMED KHALFAN GHAILANI was held until, at least, the defendant has been notified of the locations of the defendant's detention and provided the defendant with the opportunity to visit and inspect such sites, and for any other such relief as this Court deems just and proper.

Dated: New York, New York
June 30, 2009

Yours, etc.

Peter Quijano

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TO: Honorable Lewis A. Kaplan
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
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